

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC., PELVIC
REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION**

**THIS DOCUMENT RELATES TO
THE CASES ON THE EXHIBIT
ATTACHED HERETO**

**Master File No. 2:12-MD-02327
MDL No. 2327**

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

JOINT MOTION TO DISMISS WITHOUT PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss without prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41(a)(2). No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Sean McCrary

Sean McCrary
Tonya L. Melnichenko
Franklin D. Azar & Associates
14426 East Evans Avenue
Aurora, CO 80014
(303) 757-3300
melnichenkot@fdazar.com
Counsel for Plaintiffs

/s/ William M. Gage

William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338

(304) 414-1800
srobinson@tcspllc.com
Counsel for the Ethicon Defendants

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A

Civil Action No.	Case Style
2:12-cv-08429	Linda J. Craven and Scott A. Craven v. Ethicon, Inc.; Johnson & Johnson
2:13-cv-03616	Monica Rose Bertsch and Shane Thomas Bertsch v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-03881	Janice J. Hennessy and William Hennessy v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-03959	Jamie A. Nevarez v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-04149	Christine Chamberlin and Allen Chamberlin v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-06772	Lucinda Renee Edge v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-07677	Vernetta L. Washburn v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-24220	Antonette Trujillo and Raymond Trujillo v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-27310	Janell Fiscus v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-27315	Karen L. Getchell v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-27326	Bonita Jo Leininger and George H. Leininger v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:14-cv-28793	Elsie C. Fernandez and Antonio Fernandez v. Ethicon, Inc.